

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

FILED
RICHARD W. NAGEL
CLERK OF COURT

2022 FEB 24 PM 2:23

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MARK WOLFORD and
TRACY WOLFORD,

Defendants.

CASE NO. 2:22-cr-00034

JUDGE Morrison

INDICTMENT

18 U.S.C. § 2

18 U.S.C. § 371

18 U.S.C. § 922(a)(6)

FORFEITURE ALLEGATION

THE GRAND JURY CHARGES:

COUNT ONE

(Conspiracy to Commit an Offense Against the United States)

From on or about September 17, 2021 to on or about September 22, 2021, in the Southern District of Ohio, the defendants, **MARK WOLFORD** and **TRACY WOLFORD**, knowingly and intentionally conspired and agreed with each other, to commit an offense against the United States, that is, to knowingly make a false statement to Vance Outdoors, a licensed dealer of firearms as that term is defined in Chapter 44, Title 18, United States Code, in connection with the acquisition of firearms, which statement was intended and likely to deceive Vance Outdoors as to a fact material to the lawfulness of the sale of said firearms to the defendants under Chapter 44, Title 18, United States Code, in violation of Title 18, United States Code, Section 922(a)(6).

In violation of 18 U.S.C. § 371.

COUNT TWO

(False Statement During Purchase of Firearms)

On or about September 22, 2021, in the Southern District of Ohio, the defendants, **TRACY WOLFORD** and **MARK WOLFORD**, in connection with the acquisition of firearms,

to wit, a Kel-Tec CP33 pistol bearing serial number MBJ98, and a Mossberg Blaze 47 rifle bearing serial number RA0026930, from Vance Outdoors, a licensed dealer of firearms as that term is defined in Chapter 44, Title 18, United States Code, knowingly made a false and fictitious statement to Vance Outdoors, which statement was intended and likely to deceive Vance Outdoors with respect to a fact material to the lawfulness of the sale of said firearms under Chapter 44 of Title 18, United States Code, in that **TRACY WOLFORD** did execute a Department of Justice, Bureau of Alcohol and Tobacco, Firearms, and Explosives Form 4473, to the effect that **TRACY WOLFORD** was the actual transferee/buyer of the Kel-Tec CP33 pistol bearing serial number MBJ98, and the Mossberg Blaze 47 rifle bearing serial number RA0026930 listed on the Form 4473, when in fact, as the defendants then knew, **MARK WOLFORD** was the actual transferee/buyer of said firearms.

In violation of 18 U.S.C. §§ 922(a)(6) and 924(a)(2) and 18 U.S.C. § 2.

FORFEITURE ALLEGATION

The allegations of Count Two of this Indictment are realleged and by this reference fully incorporated herein for the purpose of alleging forfeitures to the United States of America pursuant to 18 U.S.C. §924(d)(1) and 28 U.S.C. §2461(c).

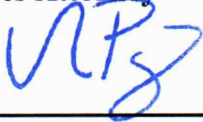
Upon conviction of the offense alleged in Count Two of the Indictment, the defendants, **TRACY WOLFORD** and **MARK WOLFORD**, shall forfeit to the United States all firearms and ammunition used and/or possessed in violation of such offenses, including but not limited to: a Kel-Tec CP33 pistol bearing serial number MBJ98, and a Mossberg Blaze 47 rifle bearing serial number RA0026930, seized on December 7, 2021.

Forfeiture in accordance with 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c) and Rule 32.2 of the Federal Rules of Criminal Procedure.

A TRUE BILL.

s/Foreperson
FOREPERSON

KENNETH L. PARKER
United States Attorney



NICOLE PAKIZ
Assistant United States Attorney